

BRAUNHAGEY & BORDEN LLP

Mitchell C. Stein, Esq. (NJ Bar No. 040751988)
stein@braunhagey.com
Pratik K. Raj Ghosh, Esq. (admitted *pro hac vice*)
ghosh@braunhagey.com
118 West 22nd Street, 12th Floor
New York, NY 10011
Tel: (646) 829-9403

David H. Kwasniewski, Esq. (admitted *pro hac vice*)
kwasniewski@braunhagey.com
351 California Street, 10th Floor
San Francisco, CA 94104
Tel: (415) 599-0210

Attorneys for B&G Foods, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

PATRICIA DEAN, JOHN GALLOWAY,
and BRIAN BLASSINGAME, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

B&G FOODS, INC.,

Defendant.

Case No.: 2:22-CV-01338-SDW-JSA

**DECLARATION OF PRATIK K. RAJ
GHOSH, ESQ. IN SUPPORT OF
DEFENDANT B&G FOODS, INC.'S
MOTION TO DISMISS PLAINTIFFS'
FIRST AMENDED CLASS ACTION
COMPLAINT**

Motion Date: July 18, 2022

*[Motion to Dismiss, Request for Judicial
Notice, and [Proposed] Orders Filed
Concurrently Herewith]*

I, Pratik K. Raj Ghosh, Esq., declare:

1. I am counsel of record for Defendant B&G Foods, Inc. (“B&G Foods”) in the above-captioned action. I make this declaration based on personal knowledge. If called as a witness, I could, and would, testify competently to the facts stated herein.

2. Attached as **Exhibit A** is a true and correct copy of the complaint that Plaintiffs’ counsel filed—and shortly thereafter withdrew—on behalf of Brian Blassingame in the Northern District of California. Much of the original complaint in the instant litigation is copied verbatim from the complaint in the now-dismissed *Blassingame* action.

3. Attached as **Exhibit B** is a true and correct copy of an email thread between myself and Kevin Laukaitis, Esq., counsel for Plaintiffs, regarding Plaintiffs’ request for an extension to amend their complaint.

I declare under penalty of perjury that the foregoing is true and accurate.

Dated: June 14, 2022

Respectfully submitted,

By: *s/ Pratik Ghosh*

Pratik K. Raj Ghosh, Esq.*
BRAUNHAGEY & BORDEN LLP
ghosh@braunhagey.com
118 West 22nd Street, 12th Floor
New York, New York 10011
Tel: (646) 829-9403

Attorney for B&G Foods, Inc.

**admitted pro hac vice*